

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Text-Enabled Toll Free Numbers)	WC Docket No. 18-28
)	
Toll Free Service Access Codes)	CC Docket No. 95-155

COMMENT OF TWILIO INC.

Dated: August 23, 2018

Twilio Inc. (“Twilio”) submits this comment in response to the Federal Communications Commission’s Notice of Proposed Rulemaking for Text-Enabled Toll Free Numbers on WC Docket No. 18-28 and CC Docket No. 95-155.¹

Twilio commends the Commission’s measured approach to implementing common sense guard rails for toll free number subscribers wishing to interact with consumers via text messaging. Text messaging is an increasingly important communications method for consumers, and the Commission is right to want to bring the benefit of text messaging to businesses, nonprofit organizations, and consumers while at the same time protecting the integrity of the nation’s very successful toll free system.

The Declaratory Ruling and questions posted by the Notice of Proposed Rulemaking indicate the Commission’s effort to enact a process that fosters the growth of innovative communications use cases. At the same time, the Commission is correct to want to preserve the rights of the toll free number subscriber and protect the functionality of a system that has been trusted by businesses, organizations and consumers since 1967. In addition to clarity of who may text enable a toll free phone number, Twilio notes there are additional challenges to the impartial administration and overall functionality of the toll free texting ecosystem that the Commission should affirmatively address in order to “promote a competitive and innovative marketplace in text messaging services.”²

The Commission has substantial experience delegating numbering administration functions to third parties, and as required by statute, the Commission has consistently taken action to ensure that only impartial entities serve as administrators. It is consistent and convenient for a single provider to provide the registry for both voice and text message registration on toll free numbers. A single, reliable registry minimizes confusion and uncertainty into the industry, both of which

¹ See Text-Enabled Toll Free Numbers, Toll Free Service Access Codes, WC Docket No. 18-28 and CC Docket No. 95-155, FCC 18-77

<https://www.federalregister.gov/documents/2018/07/24/2018-15158/text-enabled-toll-free-numbers-toll-free-service-access-codes>

² Chairman Pai statement Re: Text-Enabled Toll Free Numbers, WC Docket. No. 18-28. P. 22

could devalue toll free resources. Twilio sees no need for a separate registry from the existing SMS database. Multiple registries would prompt confusion and add additional cost, without clear benefit to the subscriber. It is further imperative that the registry be administered by a reliable, trusted and neutral party.

Twilio has utilized the Texting and Smart Services (TSS) Registry since its launch in 2015. As a RespOrg and messaging provider, Twilio finds the use of a single source of provisioning for both voice and text messaging to be simple and efficient. In addition to the registry's reliability, Twilio values its administration by Somos as the Commission-designated neutral Toll Free Number Administrator (TFNA) for toll free voice services.

In contrast, Twilio notes that time-consuming, customer disrupting problems occur when other providers do not use the TSS Registry.

For all of these reasons, Twilio recommends that the TFNA be established by the Commission as the administrator for toll free text messaging in addition to voice. In concert with this determination, the Commission should also adopt the TSS Registry as the method for updating the SMS Database to reflect subscribers' toll free text messaging authorizations.

Respectfully submitted,

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